

REMARKS

Claims 1, 8, and 15 have been amended. Claims 1-22 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Telephone Interview Summary:

A telephone interview was conducted on October 13, 2010 between Examiner Evans and Applicants' representatives, Robert Kowert and Ann Harwood. Differences between Applicants' claimed invention and the teachings of the cited art were discussed. For example, none of the cited references describe the use of re-usable helper methods to perform actions on existing electronic forms of currently executing applications, or a mapping between each of a plurality of electronic forms and a respective one of a plurality of providers of server side processing, as in Applicants' claims. Instead, the references describe tools for building web pages for new web based applications that are under development. Possible amendments to the independent claims to clarify these distinctions were discussed, including an amendment to include the term "non-transitory" in claim 8. The Examiner was generally in agreement that amendments to the claims such as those discussed during the telephone interview would overcome the current rejection of Applicants' independent claims.

The points discussed in the interview are elaborated upon below.

Section 103(a) Rejection:

The Office Action rejected claims 1-22 under 35 U.S.C. § 103(a) as being unpatentable over Mui et al. (U.S. Publication 2003/0229529) (hereinafter "Mui") in view of Eglin (U.S. Publication 2003/0084120) and further in view of Smith et al. (U.S. Publication 2003/0167355) (hereinafter "Smith"). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants first note that amendments similar to those discussed in the telephone interview held October 13, 2010 have been made in claims 1, 8, and 15.

Regarding claim 1, the cited art fails to teach or suggest *a server computer providing a first page in a high order presentation language to a client computer for display, wherein the first page is associated with an electronic form of an application currently executing on at least the server computer and comprises an encoding of said electronic form, wherein said electronic form is one of a plurality of electronic forms associated with respective pages, and wherein each of the plurality of electronic forms is mapped to a respective one of a plurality of providers of server-side processing deployed upon the server computer, and wherein at least two of the electronic forms are mapped to different ones of the plurality of providers.*

The Examiner cites Mui (in at least paragraphs 76, 976, and 1206, and in FIGs. 4 and 17) as teaching displaying, by a client computer, a first page in a high order presentation language. Mui is directed to a **Business Applications Management System Platform** and method for performing enterprise workforce planning, e.g., for identifying employees to use in achieving a goal (such as completing a large software development project). The method includes establishing competency records, person records, and building goal profile records, then comparing competencies in person records to required competencies to identify best fit persons for achieving the goal. FIGs. 4 and 7 illustrate various embodiments of the platform. As noted by the Examiner, one of the components of the platform is an Information Distributor Server 521 (or 1201), which defines a high-level query language and a set of agents for implementing information services. As noted in other portions of Mui, the Information Distributor Server implements an Information Distributor Developer's Kit (IDK) to be used by software application developers for the development of web pages and web based applications. The Information Distributor can keep developers or managers informed about the status of software developments. The cited passage in paragraph 976 describes that a manager can view a list of updates and call up various reports as part of his custom home page provided by the corporate portal.

The cited passage in paragraph 1206 describes that various servers in the system include runtime support for a Java Virtual Machine™.

Applicants assert that none of teaches anything about a server computer providing a first page in a high order presentation language to a client computer for display, wherein the first page is associated with an electronic form of an application currently executing on at least the server computer and comprises an encoding of said electronic form, wherein said electronic form is one of a plurality of electronic forms associated with respective pages, that each of the plurality of electronic forms is mapped to a respective one of a plurality of providers of server-side processing deployed upon the server computer, or that at least two of the electronic forms are mapped to different ones of the plurality of providers.

The Examiner admits that Mui fails to disclose that each of the plurality of forms is mapped to a respective one of a plurality of providers of server-side processing deployed upon a server computer, and relies on Egli to teach this limitation. Egli is directed to a software framework for web-based applications. The framework includes command tags for some generic Web application activities, and can be used to create a custom command tag that can be embedded in a Web page. The cited passages describe, in general terms, that a JVM enables Java bytecode to be executed on any processor or operating system, and allows two machines on different platforms to connect. The passages also describe JavaServer Pages, a server-side technology. One of the cited passages describes that the Web page designer can name the developer-defined action tag and enter the tag name in the tag library descriptor text file, stating, "... This entry (mapped via 455) identifies the name of the custom JSP tag used by a servlet to invoke the corresponding extended tag action subclass." While this passage describes the use of servlets to invoke actions, it teaches nothing about mapping each of a plurality of electronic forms to a respective one of a plurality of providers of server-side processing deployed on a server computer or that at least two of the electronic forms are mapped to different service providers), as required by Applicants' claim.

Further regarding claim 1, the cited art fails to teach or suggest *the server computer receiving input indicating a user action that is performed on the first page and that represents an action to be implemented on the electronic form of the currently executing application that is associated with the first page.*

The Examiner cites Mui, in at least FIGs. 11 and 13 (and associated text), as teaching receiving, by the client computer, input indicating an action to be implemented on the first page. The first of these passages describes that the IDK uses a standard language for representing web metadata, a standard language for querying web metadata, and a set of APIs for defining information services. The second passage describes that one of these APIs provides delivery agents that may be integrated with a variety of delivery mechanisms to return the results of a query or match. In other words, these passages describe tools, language standards, and APIs provided by the developer's kit (IDK) for building a web page for a new web application that is under development. They teach absolutely nothing about a server computer receiving input indicating a user action that is performed on a page displayed in a high order presentation language (i.e. the "first page" of Applicants' claim) and that represents an action to be implemented on an electronic form of a currently executing application that is associated with the first page.

Also regarding claim 1, the cited art fails to teach or suggest *in response to said receiving: the respective one of the plurality of providers that is mapped to the electronic form that is associated with the first page generating a second page in a high order presentation language; and the respective one of the plurality of providers that is mapped to the electronic form that is associated with the first page providing the second page to the client computer for display.*

The Examiner cites FIG. 8C and paragraphs 21 and 533 as teaching in response to said receiving: generating, by the respective one of the plurality of providers, a second page in a high order presentation language; providing... the second page to the client

computer for display. The cited figure and passage describe a web page development process by which users can create, render, and present web content, including reformatting and displaying acquired content using style sheets. There is nothing in these passage that describes a respective provider of server-side processing (one that is mapped to the electronic form associated with the first page) generating and displaying a second page in response to receiving input indicating a user action taken on the first page that represents an action to be implemented on the electronic form. First, these passages are directed to web page development for web based applications that are under development, not actions taken on existing pages (i.e. pages associated with electronic forms of a currently executing application). In addition, there is no such mapping of forms (or actions therein) to respective providers of server-side processing taught by the cited references.

The cited art also fails to teach or suggest *in response to said calling a corresponding render method and dependent on the performance of the action on the electronic form, said render method performing: populating a name value pair with corresponding data.*

The Examiner cites Mui in paragraphs 778 and 781 as teaching these limitations. The first cited passage describes a list of widgets that can be used when building a web page for a new web application under development. The second cited passage describes that one of these widgets is a single line text element that can be rendered as a password or text html form field. These passages teach nothing about this specific limitation of claim 1 involving the a particular one of a plurality of service providers (one mapped to an electronic form of a currently executing application) populating of a name value pair with corresponding data dependent on the performance of an action on the electronic form, as in Applicants' claim.

In addition, the cited art fails to teach or suggest *the server computer receiving input indicating a second user action that represents a second action to be implemented on another electronic form of an application executing on at least the server computer;*

and a different one of the plurality of providers that is mapped to the other electronic form generating another page in a high order presentation language, wherein said generating another page comprises calling at least one of said helper class method and said render method to perform the second action. The Examiner cites Mui as teaching wherein at least one of said helper class method and said render method is re-usable in performing a subsequent action on a page in paragraph 535. This passage again describes that the IDK supports the use of widgets and style sheets for developing web pages for a new web based application under development. It does not describe that two different service providers (mapped to two different electronic forms) call at least one of the same helper class or render methods to perform an action on an electronic form associated with a first page and to perform a second action on another page of a currently executing application.

Applicants assert that Egli and Smith, whether considered alone or in combination with each other and/or with Mui, do not overcome the deficiencies of Mui in teaching the above-referenced limitations of Applicants' claim 1.

To establish a *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP 2143.03. As discussed in detail above, the cited art does not teach or suggest all limitations of Applicants' claim 1.

In addition, Applicants again assert that the Examiner has failed to show a clear and particular reason for combining Mui and Egli in teaching the specific limitations of claim 1. Applicants again assert that the Examiner's stated reason to combine the references is not commensurate with the feature of Egli he is attempting to combine with Mui to result in the claimed invention. The Examiner states that Mui discloses a Java API involving helper class scripts to render required HTML web pages based on user inquiry, and submits, "It would have been obvious to one of ordinary skill in the art at the time of the invention to combine the method for enterprise workforce planning of Mui with software framework for web-based applications of Egli because it is an efficient way

to for an operation system to call on any processor regardless of the operating system, hence allowing two machines on different platforms able to connect.”

As noted in Applicants’ previous Response, the Examiner appears to be referring to paragraph [0035] of Egli, which describes an advantage of using a Java Virtual Machine (JVM). Applicants assert that this has absolutely nothing to do with the limitations of Applicants’ claim, nor would the use of a JVM in Mui’s enterprise workforce planning platform provide the features the Examiner relies on Egli to teach. The use of a JVM and the fact that it allows operating system calls between machines by translating programming code provides advantages in the system of Egli that have nothing to do with the limitations of claim 1 that are not taught by Mui (e.g., the mapping of electronic forms to respective providers of server-side processing). Therefore, the Examiner’s reason to combine is improper. Applicants further assert that the system of Mui already describes the use of a JVM (in at least paragraphs [0216], [0386], [0430], [0530], and [1206]) without modification to include any features taught by Egli. Therefore, there would be no reason to look to Egli to provide methods for using a JVM. The Examiner’s broad, conclusory remarks include nothing about the specific limitations of this claim. Nor do the references themselves include any teaching or suggestion to combine them in a way that would result in Applicant’s claimed invention. As discussed above, Mui and Egli do not teach the above-referenced limitations of Applicants’ claim. Therefore, even if the references were combined, the combination would not teach or suggest Applicants’ claimed invention.

For at least the reasons stated above, Applicants assert that the Examiner has failed to establish a *prima facie* rejection of claim 1.

Claims 8 and 15 include limitations similar to those of claim 1 discussed above and were rejected for the same reasons. Therefore, the arguments presented above apply with equal force to these claims, as well.

Dependent Claims:

Applicants assert that numerous ones of the dependent claims recite further distinctions over the cited art. Applicants respectfully traverse the rejections of these claims for at least the reasons given above in regard to the claims from which they depend. None of the other cited references overcome any of the deficiencies of the cited art noted above in regard to the independent claims. Since the rejections have been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time. Applicants reserve the right to present additional arguments.

CONCLUSION

Applicants submit the application is in condition for allowance, and an early notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-91000/RCK.

Respectfully submitted,

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